REMARKS

In the Office Action dated June 19, 2006, claims 1-23 were rejected under 35 U.S.C. § 103 over U.S. Patent Application Publication No. 2003/0140119 (Acharya) in view of U.S. Patent No. 6,931,574 (Coupal).

It is respectfully submitted that a *prima facie* case of obviousness has not been established with respect to independent claim 1, for at least the following reasons: (1) no motivation or suggestion existed to combine the teachings of Acharya and Coupal; and (2) the references when combined do not teach or suggest all elements of the claim. *See* M.P.E.P. § 2143 (8th ed., Rev. 3), at 2100-135.

Point (2) is addressed first. The Office Action conceded that Acharya fails to disclose maintaining a conversation logic repository that includes at least one conversation logic that is external to the workflow definition. 6/19/2006 Office Action at 4. However, the Office Action incorrectly stated that Acharya discloses the other elements of claim 1, namely determining a corresponding conversation logic in the conversation logic repository based on the discovered service, and dynamically plugging in the determined conversation logic into the node (of the workflow definition) at run time.

With respect to the determining task, the Office Action cited ¶ [0037] of Acharya. This passage describes a service detector module of a service discovery proxy (element 102 in Fig. 1 of Acharya) that receives a service query and determines the appropriate communication protocol to use to send queries to local devices for discovering services of such local devices. Selecting the appropriate communication protocol to use for communicating with local devices is not the same as determining a corresponding *conversation logic* based on the *discovered service*, as recited in claim 1. In fact, note that the communication protocol that is selected by the service detector module of the service discovery proxy in Acharya relates to sending queries from the service discovery proxy to local devices to discover services provided by such local devices. Thus, the operation described in ¶ [0037] of Acharya relates to selecting the appropriate communication protocol to allow the discovery of services; therefore, clearly, the operations in ¶ [0037] of Acharya does not determine a corresponding conversation logic based on the *discovered* service, because the communication protocol selection operation in ¶ [0037] has to be performed *before* the service discovery proxy can determine services of local devices.

Even more fundamentally, even if the communication protocol of ¶ [0037] of Acharya can be considered the conversation logic recited in claim 1, it is noted that Acharya provides absolutely no teaching or suggestion whatsoever of dynamically *plugging* in the determined conversation logic into the node of the workflow definition at run time. The Office Action cited ¶¶ [0031]-[0034] as disclosing the dynamical plugging task of claim 1. However, note that the cited passages refer to the service discovery proxy responding to a request for service discovery by sending queries to local devices and receiving responses to such queries regarding available services provided by the local devices. The determining of services available at local devices, as performed at ¶¶ [0031]-[0034] of Acharya, clearly does not teach or suggest dynamically plugging in the determined conversation logic into the node at run time.

Coupal does not disclose elements noted above as missing from Acharya. Coupal describes a protocol analyzer for analyzing the content of a data frame to determine characteristics of the content of the data frame. Coupal, 6:29-44. The data frame analysis performed by Coupal provides absolutely no suggestion of determining a corresponding conversation logic in a conversation logic repository based on a discovered *service*, and dynamically plugging the determined conversation logic into a node of a workflow definition at run time. Since the hypothetical combination of Acharya and Coupal fails to teach or suggest all elements of claim 1, it is respectfully submitted that a *prima facie* case of obviousness has not been established with respect to this claim.

A further defect of the obviousness rejection is that no motivation or suggestion existed to combine the teachings of Acharya and Coupal. As mentioned above, Acharya relates to using a service discovery proxy to discover services provided by local devices within a local domain, in response a request from an inquirer. Acharya, ¶¶ [0029]-[0033]. In contrast, Coupal relates to a protocol analyzer that analyzes a data frame to ascertain characteristics of the content of the data frame, where the data frame is captured on the network. Coupal, 6:29-37. The ascertained characteristics include the protocols used in the data frame. Coupal, 6:37-43. The protocol analyzer of Coupal, which uses the protocol database 34 cited by the Office Action, is completely unrelated to the subject matter of Acharya. In fact, a person of ordinary skill in the art would not have been motivated to use the protocol analyzer (and the associated protocol database) in the system of Acharya, which relates to discovering services in local devices.

Therefore, the *prima facie* case of obviousness is defective for the additional reason that no motivation or suggestion existed to combine the teachings of Acharya and Coupal.

A *prima facie* case of obviousness has also not been established with respect to independent claim 3 over Acharya and Coupal. The Office Action erroneously stated that Acharya teaches the selecting of a conversation logic from a conversation logic repository based on a returned service identifier (that was received in response to a service selection query sent to an electronic services platform or other service broker). The Office Action cited ¶¶ [0037]-[0038] of Acharya as disclosing the selecting task of claim 3. The cited passages refer to determining an appropriate communication protocol to use for the purpose of sending queries to local devices to discover services provided by the local devices, and then transmitting a response from the service discovery proxy back to the inquirer containing the responses from the local devices. There is absolutely no suggestion whatsoever in these passages of selecting a conversation logic based on a returned service identifier.

Also, as discussed above, no motivation or suggestion existed to combine the teachings of Acharya and Coupal. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 3.

Independent claim 11 is allowable for reasons similar to those of claim 3.

Dependent claims, including newly added dependent claims 24-26, are allowable for at least the same reasons as corresponding independent claims. Allowance of all claims is therefore respectfully requested.

The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (10010118-1).

Respectfully submitted,

Date: 9-18-2006

Dan C. Hu
Registration No. 40,025
TROP, PRUNER & HU, P.C.
1616 South Voss Road, Suite 750
Houston, TX 77057-2631
Telephone: (713) 468-8880
Facsimile: (713) 468-8883